

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

IN RE KRAFT HEINZ SECURITIES
LITIGATION

Case No. 19-cv-01339

The Honorable Robert M. Dow, Jr.

**PLAINTIFFS' RESPONSE TO THE KRAFT HEINZ DEFENDANTS' MOTION FOR
EXTENSION OF TIME TO COMPLETE DISCOVERY**

Lead Plaintiffs Sjunde APFonden (“AP7”) and Union Asset Management Holding AG (“Union”), together with additional named Plaintiff Booker Enterprises Pty Ltd. (collectively, “Plaintiffs”), respectfully submit this Response to the Kraft Heinz Defendants’ Motion for Extension of Time to Complete Discovery (ECF No. 380) (the “Motion”). Plaintiffs write briefly to clarify the Kraft Heinz Defendants’ assertions in the Motion that they had requested Plaintiffs’ “consent . . . to file this motion,” and that “Plaintiffs consented to the motion.” Motion ¶16. Plaintiffs did not consent to the Motion—which Plaintiffs were not provided in advance of its filing—but consented only as to the Kraft Heinz Defendants’ request to extend the schedule by four months. For example, Plaintiffs do not consent to the Motion’s assertion that “an additional extension of time [may be] required” (Motion ¶13) or as to the Motion’s characterizations of Defendants’ discovery efforts. For the avoidance of doubt, Plaintiffs reserve all rights to challenge these and all other assertions made by Defendants in the Motion without contesting the four-month extension Defendants currently request.

Dated: July 28, 2022

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